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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ROBERT CONTRERAS

Plaintiff,

vs.

CITY OF LOS ANGELES; JULIO
BENAVIDES; MARIO FLORES; and
DOES 1-10, inclusive,

Defendants

Case No. CV11-01480 SVW (SH)

Honorable Stephen V. Wilson

STIPULATION REGARDING
DISBURSEMENT

COME NOW THE PARTIES through their counsel of record and stipulate
as follows.

1. On September 21, 2012, a jury awarded Plaintiff \$5,725,000.00 in
damages. On March 28, 2013, this Court awarded Plaintiff \$892,550.00 in
attorneys' fees and costs pursuant to 42 U.S.C. § 1988. In addition, the Clerk of the
Court awarded Plaintiff \$9,340.30 in costs, as authorized by this Court's local
rules. In total, the Court after jury trial found Defendants liable to Plaintiff in the

1 total amount of \$6,626,890.30. The Court directed Defendants to post a
2 supersedeas bond in the amount of \$8,283,612.88 to secure Plaintiff with respect to
3 interest, costs, and attorneys' fees on appeal (Doc. No. 249).

4 2. The weekly average 1-year constant maturity Treasury yield, as
5 published by the Board of Governors of the Federal Reserve System for the
6 calendar week preceding the date of each award is set forth below. *See, generally,*
7 18 U.S.C. § 3612; 40 U.S.C § 258(e)(1). Interest shall be calculated by the Clerk
8 based on the following, and shall be compounded annually:

<u>Amount</u>	<u>Date</u>	<u>Interest Rate</u>	<u>Interest</u>
\$5,725,000.00	September 21, 2012	0.18	
\$892,550.00	March 28, 2013	0.14	
\$9,340.30	March 21, 2013	0.15	

13 Total Interest:

15 3. The parties have also settled the attorneys' fees owed on appeal for
16 the total amount of \$230,000.00, and that amount has been approved by the City
17 Council and Mayor.

18 4. Accordingly, the parties stipulate that the amount of \$6,626,890.30,
19 plus accrued post-judgment interest calculated by the Clerk, plus \$230,000.00 can
20 be disbursed to Plaintiff and his attorneys. The balance must be paid to the City of
21 Los Angeles.

22 5. The parties jointly request that the Court enter an order consistent
23 with this stipulation. Specifically, the parties request that from the supersedeas
24 bond, the Clerk be directed to prepare (1) a draft in the amount of \$6,626,890.30,
25 plus accrued post-judgment interest calculated by the Clerk, plus \$230,000.00,
26 payable to The Law Offices of Dale K. Galipo Client Trust Account, to be
27 delivered to The Law Offices of Dale K. Galipo, 21800 Burbank Boulevard Suite
28 310, Woodland Hills, CA 91367; and (2) a draft for the remainder of the bond

1 payable to the City of Los Angeles, to be delivered to Craig Miller, Office of the
2 City Attorney, 200 N. Main St., Sixth Floor, Los Angeles, CA 90012.

3 Respectfully Submitted,

4 DATED: March 25, 2016

LAW OFFICES OF DALE K. GALIPO

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6 By _____/s/ Dale K. Galipo

Dale K. Galipo

7 *Attorneys for Plaintiff*

8 DATED: March 30, 2016

9
10 By _____s/ Craig Miller

Craig Miller

11 *Attorneys for Defendants*
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